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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA**

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**JOHNATHAN TALBOT,**

**Plaintiff,**

**v.**

**MANOAH AINUU, *et al.*,**

**Defendants.**

**Case No. 2:23-cv-00066-BMM**

**MOTION FOR LEAVE FOR SETH  
D. BERLIN TO APPEAR *PRO HAC  
VICE***

NOW COMES Defendant VF Outdoor, LLC d/b/a The North Face (“The North Face”), incorrectly sued as The North Face Apparel Corp., by and through undersigned counsel, and hereby moves for an Order permitting Seth D. Berlin to appear *pro hac vice* for all purposes, including being heard in open court, in the above-referenced matter, and in support thereof states:

1. The North Face has retained Seth D. Berlin of Ballard Spahr LLP to represent it in the matter.
2. Mr. Berlin is of good moral character and meets the requirements for *pro hac vice* admission under Local Rule 83.1(d).
3. Attached hereto is the affidavit of Mr. Berlin, as required by Local Rule 83.1(d)(4).
4. Mr. Berlin does not reside in Montana and is not regularly employed in Montana.
5. The undersigned is a member in good standing of the Bar of this Court and hereby consents to serve as local counsel as required by L.R. 83.1(d)(3).

Based on the foregoing, Defendant The North Face moves the Court for an Order admitting Seth D. Berlin *pro hac vice* in the above-captioned matter. This motion is accompanied by a proposed order.

DATED this 31st day of October, 2023.

**MELOY LAW FIRM**

By: /s/ Peter Michael Meloy  
Peter Michael Meloy  
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*Attorneys for VF Outdoor, LLC d/b/a The  
North Face*

**CERTIFICATE OF SERVICE**

I hereby certify that on 31 October 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record pursuant to the Local Rules.

/s/ Peter Michael Meloy  
Peter Michael Meloy